

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

PlayUp, Inc., a Delaware Corporation,

Plaintiff,

v.

Dr. Laila Mintas, an individual,

Defendant.

Dr. Laila Mintas, an individual,

Counter-Claimant,

v.

PlayUp, Inc., a Delaware Corporation; PlayUp
Ltd., an Australian company; Daniel Simic, an
Individual,

Counter-Defendants.

Case No. 2:21-cv-02129-GMN-NJK

**JOINT STIPULATION TO EXTEND
DEADLINE TO RE-FILE MOTION FOR
PROTECTIVE ORDER
(First Request)**

On October 25, 2022, Plaintiff/Counter-Defendant PlayUp Inc. (“PlayUp US”) filed its Motion for Protective Order (ECF No. 234). On December 8, 2022, the Court ordered PlayUp US’ motion denied without prejudice (ECF No. 276). The order additionally instructed counsel for Dr. Mintas and counsel for PlayUp US (collectively, the “Parties”), to return to the meet and confer process regarding PlayUp US’ motion for protective order and other discovery motions in an effort to eliminate or narrow the issues in dispute. The Court further ordered that if any of the discovery motions at issue were to be renewed, it must be done by January 6, 2023. *Id.* The Parties met to confer on December 16, 2022, and January 4, 2023. As a result of these efforts, the Parties hereby stipulate to the following:

1. The Parties, pursuant to LR IA 6-1, stipulate to extend the court-ordered deadline for PlayUp US, if necessary, to renew its motion for protective order to January 20, 2023. The Parties have compromised on aspects of PlayUp US’ motion for protective order but are continuing to confer on the issue of the Non-Disclosure Agreement (“NDA”) between PlayUp and FTX, and its application to certain documents that PlayUp US marked as

Confidential. Part of those efforts include attempting to obtain input from a non-party, FTX, which is currently in the process of Chapter 11 bankruptcy. As such, the Parties need additional time to continue those efforts to attempt to reach a resolution without the need for Court intervention.

This stipulation will be without prejudice as to all of the parties' rights, defenses, and positions and cannot be used as a basis for any argument regarding waiver of privilege.

IT IS SO STIPULATED

Dated this 6th day of January 2023.

NAYLOR & BRASTER

/s/ Benjamin Gordon

Jennifer L. Braster Esq.
Nevada Bar No. 9982
Benjamin B. Gordon, Esq.
Nevada Bar No. 15552
1050 Indigo Drive, Suite 200
Las Vegas, NV 89145

*Attorneys for Defendant/Counter-
Claimant Dr. Laila Mintas*

Dated this 6th day of January 2023.

ZUMPARO PATRICIOS POPOK & HELSTEN

/s/ Michael Popok

Michael S. Popok
New York Bar No. 2475226
(Admitted *pro hac vice*)
134 East 38th Street
New York, New York 10016
212-542-2564
MPopok@zplaw.com

Amanda J. Brookhyser
Nevada Bar No. 11526
1210 South Valley View Blvd., Suite 215
Las Vegas, NV 89102
702-583-3326
ABrookhyser@zplaw.com

*Attorneys for Plaintiff/Counter-Defendant
PlayUp Inc., and Counter-Defendants
PlayUp Ltd. and Daniel Simic*

ORDER

IT IS SO ORDERED.

DATED this 9th day of January, 2023


UNITED STATES MAGISTRATE JUDGE